

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554**

In the Matter of

CPNI Compliance Report DA 06-223

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EB Docket No. 06-36  
EB-06-TC-060

**CERTIFICATION OF CPNI FILING**

Lakeland Telecom, Inc., (Reporter) by its attorney, hereby submits the CPNI compliance report required by the Commission's January 30, 2006, *Public Notice*, DA 06-223. Attached hereto is a copy of Reporter's most recent CPNI compliance certificate.

Respectfully submitted,



Timothy E. Welch

Hill & Welch

1330 New Hampshire Ave., N.W. #113

Washington, D.C. 20036

202-775-0070[9026] [FAX]

February 6, 2006

Its Attorney

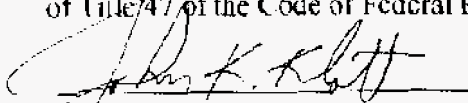


**Lakeland Telecom • Luck and Milltown Mutual Telephone Companies**

28 1st Avenue W. P.O. Box 300, Luck, Wisconsin 54853-0300 Tel. 715-472-2101 Fax 715-472-8880  
107 N. Milltown Avenue P.O. Box 40, Milltown, Wisconsin 54858-0040 Tel. 715-825-2171 Fax 715-825-4299

**Certificate of Compliance: Customer Proprietary Network Information (CPNI)**

This certifies that the undersigned, as a corporate officer of Lakeland Communications, has personal knowledge that Lakeland Communications and its subsidiaries has established operating procedures that are adequate to ensure compliance with the CPNI rules as contained in Subpart U - Customer Proprietary Network Information - of Part 64 of Title 47 of the Code of Federal Regulations.

  
Signature

Title: President 1-25-05

**Notes:**

1. 1. We recommend that you use company letterhead for this compliance certificate.
2. 2. This does not need to be sent to the FCC. However it does need to be filed in your business office in case a customer wants to review it.



## Lakeland Telecom • Luck and Milltown Mutual Telephone Companies

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### Statement of Explanation: CPNI Compliance

This accompanying statement explains how Lakeland Communication's operating procedures ensure that we are in compliance with the rules governing CPNI as found in Subpart U – Customer Proprietary Network Information - Part 64 of Title 47 of the Code of Federal Regulations.

1. Lakeland Communications and its subsidiaries adheres to all CPNI rules as stated in Section 64.2001-64.2009 concerning the proper use of our customer's CPNI. Lakeland Communications does not use CPNI other than those legally allowable under Section 64.2005. Specifically, our notice for CPNI approval meets all requirements as listed in Section 64.2008. To further protect our customer's privacy, we have implemented all safeguards required in Section 64.2009. This includes:
  - the training of appropriate personnel as to when they are, and are not, authorized to use CPNI;
  - the implementation of an express disciplinary process for CPNI violations;
  - the implementation of a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI;
  - the maintenance of a record, for at least one year, of our own, and our affiliates' sales and marketing campaigns that use customer CPNI;
  - the establishment of a supervisory review process regarding carrier compliance with the federal CPNI rules for outbound marketing situations; and
  - the establishment of annual certification by a corporate officer to ensure compliance with the federal CPNI rules.

A copy of the subpart cited above is attached to this statement of explanation.

### Notes:

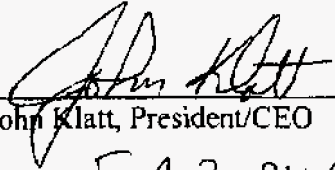
2. 1. This statement of explanation is written for a company that utilizes an opt-out CPNI campaign.
3. 2. If your company does not use CPNI for marketing purposes, you should change the second sentence in the second paragraph to reflect that fact: Lakeland Communications does not use CPNI other than those legally allowable under Section 64.2005.

**Lakeland Telecom • Luck and Milltown Mutual Telephone Companies**

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28 1st Avenue W. P.O. Box 300, Luck, Wisconsin 54853-0300 Tel. 715-472-2101 Fax 715-472-8860  
825 Innovation Avenue P.O. Box 40, Milltown, Wisconsin 54858-0040 Tel. 715-825-2171 Fax 715-825-4299

My name is John Klatt and I am an officer of Lakeland Telecom, Inc., I have personal knowledge about our company's operating procedures concerning compliance with the FCC's CPNI rules: we do not use CPNI in marketing campaigns and employees are instructed that CPNI is not to be disclosed to anyone under any circumstances under penalty of possible employment termination.

  
\_\_\_\_\_  
John Klatt, President/CEO

Dated: Feb 2, 2006

**Lakeland Telecom • Luck and Milltown Mutual Telephone Companies**

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**Certificate of Compliance: Customer Proprietary Network Information (CPNI)**

This certifies that the undersigned, as a corporate officer of Lakeland Telecom, Inc., has personal knowledge that Lakeland Telecom, Inc. has established operating procedures that are adequate to ensure compliance with the CPNI rules as contained in subpart U - Customer Proprietary Network Information - of Part 64 of Title 47 of the Code of Federal Regulations.

Signature: \_\_\_\_\_

Title: President/CEO

Date: February 2, 2006

**Lakeland Telecom • Luck and Milltown Mutual Telephone Companies**

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This accompanying statement explains how Lakeland Telecom's operating procedures ensure that we are in compliance with the rules governing CPNI as found in Subpart U - Customer Proprietary Network Information - Part 64 of Title 47 of the Code of Federal Regulations.

Lakeland Telecom, Inc. adheres to all CPNI rules as stated in Section 64.2001-64.2009 concerning the proper use of our customer's CPNI. Specifically, our notice for CPNI approval meets all requirements as listed in Section 64.2008. To further protect our customer's privacy, we have implemented all safeguards required in Section 64.2009. This includes:

- the training of appropriate personnel as to when they are, and are not, authorized to use CPNI;
- the implementation of an express disciplinary process for CPNI violations;
- the implementation of a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI;
- the maintenance of a record, for at least one year, of our own, and our affiliates' sales and marketing campaigns that use customer CPNI;
- the establishment of a supervisory review process regarding carrier compliance with the federal CPNI rules for outbound marketing situations;
- the establishment of annual certification by a corporate officer to ensure compliance with the federal CPNI rules; and
- the establishment of a procedure to notify the Commission of any instance where the opt-out mechanism did not work properly.